

NO. DC-12-04844

SANDRA PALMER
Plaintiff,

vs.

DALLAS COUNTY HOSPITAL DISTRICT
d/b/a PARKLAND HEALTH &
HOSPITAL SYSTEM
Defendant.

§ IN THE DISTRICT COURT
§
§ DALLAS COUNTY, TEXAS
§
§
§
§
§
§
§ M-298TH JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW SANDRA PALMER, Plaintiff, complaining of Defendant DALLAS COUNTY HOSPITAL DISTRICT d/b/a PARKLAND HEALTH & HOSPITAL SYSTEM, and for cause of action would respectfully show this Honorable Court as follows:

Discovery Control Plan

1. Plaintiff intends to conduct discovery under Level 2 of Texas Rule of Civil Procedure 190.3.

Parties

2. Plaintiff SANDRA PALMER (hereinafter "PALMER") is a resident of Dallas County, Texas.

3. Defendant DALLAS COUNTY HOSPITAL DISTRICT d/b/a PARKLAND HEALTH & HOSPITAL SYSTEM (hereinafter "PHHS") is a local government entity created under the laws of the state of Texas, is based in Dallas county, and can be served with process through its interim CEO at its offices located at 5201 Harry Hines Blvd., Dallas, Texas 75235.
4. Parkland is considered Plaintiff's "employer" for purposes of this claim.
5. As required by the Texas Civil Practice & Remedies Code, 30.014, the last three digits of Plaintiff's social security and Texas driver's license numbers are 719 and 869, respectively.

Jurisdiction

6. This Court has jurisdiction over this matter because Defendant is a local government entity resident in Dallas county, and the State of Texas has unambiguously waived sovereign immunity for Plaintiff's claim in Government Code § 554.0035.
7. Jurisdiction is also proper in this Court because the amount in controversy exceeds the jurisdictional minimum for this Court, but does not exceed the jurisdictional maximum.
8. Plaintiff has complied with all conditions precedent prior to filing this action.
9. This action is timely filed within 90 days of the termination of Plaintiff's employment by Defendant PHHS.

Venue

10. Venue is proper in Dallas County, Texas under Tex. Civil Practice & Remedies Code § 15.002(a)(3) as Defendant actively transacts business in Dallas County and the principal office of Defendant PHHS is also located in Dallas County.

Facts

11. PLAINTIFF was at all times material a public employee of Defendant PHHS.
12. At all times material, PHHS consistently had more than 500 employees on its payroll.
13. JOHN WOOD, STELLA COKER, and NATASHA HENDERSON were at all times material employees of PHHS.
14. PALMER had been an employee of PHHS since June 1993.
15. PLAINTIFF was employed as a medical social worker with PHHS.
16. In October 2011, PALMER was instructed by PHHS to start transcribing medication vouchers for patients, including identifying and selecting generic medications, evaluating and discussing medication options with doctors while reviewing desired medication therapies and identifying low price generics for PHHS patients.
17. PALMER did not believe that as a social worker, she was qualified nor licensed to determine the number of days for a patient to take medication, transcribe medication, and discuss drug interactions with patients.
18. Not being a nurse, PALMER questioned whether this practice is outside of her scope of certification, but supervisors NATASHA HENDERSON (hereinafter “HENDERSON”), STELLA COKER (hereinafter “COKER”), and JOHN WOOD III (hereinafter “WOOD”), stated that it is within the scope of PALMER’s social

work certification to transcribe prescription medication vouchers for PHHS patients.

19. Since PLAINTIFF was concerned about patient safety, she requested her supervisors to give her a written confirmation from the Texas Board of Social Work that it is okay for a Social Worker to transcribe prescription vouchers.
20. PLAINTIFF'S supervisors were unable to produce any document from the Texas Board of Social Work that it is okay for a social worker to transcribe prescription vouchers.
21. On December 20, 2011, PALMER wrote to the Interim CEO of PHHS, THOMAS ROYER, asking him to look into her complaint regarding patient endangerment by the PHHS agents who are enforcing the policy that social workers should transcribe prescription vouchers.
22. ROYER responded that PALMER should not engage in any activities that could endanger patient's lives and that his senior management team would immediately look into PALMER'S concerns.
23. On December 20, 2011, WOOD, COKER, HENDERSON, and MIRAM SIBLEY met with HENDERSON regarding the complaint PALMER had raised with THOMAS ROYER. At the end of the meeting, PALMER was directed to continue transcribing prescription vouchers.
24. On December 20, 2011, COKER, who is a Registered Nurse (RN) and Director of Care Management, sent an email to PALMER that the medication voucher should continue to be filled out by PALMER.

25. On December 20, 2011, WOOD, who is a Registered Nurse (RN) and Associate Chief Nursing Officer for PHHS sent an email to PALMER that HENDERSON had spoken with the Texas Social Work Board, and that the Texas Social Work Board said it is okay for a Social Worker to transcribe medication vouchers.
26. PALMER requested a written document from the Texas Social Work Board, but WOOD, COKER, or HENDERSON was not able to provide any written documentation from the Texas Social Work Board authorizing social workers to transcribe medication vouchers.
27. Since WOOD, COKER, and HENDERSON were not able to present any written authorization from the Social Work Board that social workers are authorized to transcribe patients' prescriptions onto medication vouchers, PALMER then believed that she was being asked to endanger patients' lives and violate the regulations of the Texas Social Work Board by WOOD, COKER, and HENDERSON.
28. On December 21, 2011, PALMER filed a complaint with the Texas Nursing Board about WOOD for asking PALMER to transcribe patients' prescriptions onto medication vouchers.
29. On December 21, 2011, PALMER filed a complaint with the Texas Nursing Board about STELLA COKER for asking PALMER to transcribe patients' prescriptions onto medication vouchers.
30. On December 21, 2011, PALMER filed a complaint with the Texas Social Work Board about HENDERSON for asking PALMER to transcribe patients' prescriptions onto medication vouchers.

31. PALMER also filed complaints with the Joint Commission regarding PHHS's dangerous policy of having social workers transcribe patients' prescription onto medication vouchers.
32. PALMER reasonably believes that shortly after filing her complaints, WOOD, COKER, and HENDERSON became aware that PALMER had filed complaints against them.
33. DEFENDANT PHHS has violated Texas Government Code 554.002 in retaliating against PALMER by terminating her employment within 60 days of reporting the violation of law by DEFENDANT's agents, specifically COKER, WOOD, and HENDERSON.
34. Plaintiff has contracted the services of the undersigned attorney at a rate of \$350 per hour.
35. Plaintiff attaches to the service copy for response by Defendant PHHS pursuant to Texas Rules of Civil Procedure, the following:
- Enclosure 1: Plaintiff's Requests for Disclosure from Defendant PHHS
- Enclosure 2: Plaintiff's First Set of Requests for Admission to Defendant PHHS
- Enclosure 3: Plaintiff's First Set of Interrogatories to Defendant PHHS
- Enclosure 4: Plaintiff's First Set of Requests for Production to Defendant PHHS

Prayer for Relief

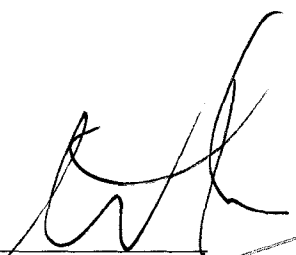
WHEREFORE, Plaintiff prays that this Court issue citation for Defendant PHHS to appear and answer, and that after trial herein, Plaintiff be awarded judgment against Defendant for the following:

- a. actual damages for emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life and other non-pecuniary losses;
- b. actual damages for lost wages and benefits;
- c. compensatory damages in an amount within the jurisdictional limits of this Court;
- d. pre-judgment and post-judgment interest at the highest rate allowed by law;
- e. reinstatement of Plaintiff to her former position with PHHS;
- f. costs of suit;
- g. attorneys' fees; and
- h. such other and further relief to which he may be justly entitled.

PLAINTIFF DEMANDS A TRIAL BY JURY FOR ALL MATTERS SO TRIABLE.

Respectfully submitted,

By: _____


Nelson Akinrinade
State Bar No. 24058715
10421 Sanden Drive
Dallas, TX 75238
Telephone: 754-224-1779
Facsimile: 972-495-7831
nelson@akinlaw.net

ATTORNEY FOR PLAINTIFF

CIVIL CASE INFORMATION SHEET

CAUSE NUMBER (FOR CLERK USE ONLY): _____ COURT (FOR CLERK USE ONLY): _____

STYLED SANDRA PALMER V. DALLAS COUNTY HOSPITAL DISTRICT DBA PARKLAND HEALTH & HOSPITAL SYSTEM
(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing. This sheet, approved by the Texas Judicial Council, is intended to collect information that will be used for statistical purposes only. It neither replaces nor supplements the filings or service of pleading or other documents as required by law or rule. The sheet does not constitute a discovery request, response, or supplementation, and it is not admissible at trial.

1. Contact information for person completing case information sheet:		Names of parties in case:	Person or entity completing sheet is:
Name: _Nelson Akinrinade_	Email: nelson@akinlaw.net	Plaintiff(s)/Petitioner(s): _Sandra Palmer_	<input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____
Address: 10421 Sanden Drive	Telephone: _754-224-1779_	Defendant(s)/Respondent(s): _Dallas County Hospital District dba Parkland Health & Hospital System_	Additional Parties in Child Support Case: Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____
City/State/Zip: Dallas, TX 75238	Fax: _972-495-7831_	Signature: State Bar No: _____ _24058715_	
[Attach additional page as necessary to list all parties]			

2. Indicate case type, or identify the most important issue in the case (select only 1):

Civil			Family Law	
Contract <i>Debt/Contract</i> <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____ <i>Foreclosure</i> <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____	Injury or Damage <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <i>Malpractice</i> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: _____ <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <i>Product Liability</i> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____ <input type="checkbox"/> Other Injury or Damage: _____	Real Property <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____ Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <i>Divorce</i> <input type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	Post-judgment Actions (non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocity (UIFSA) <input type="checkbox"/> Support Order Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____
Employment <input type="checkbox"/> Discrimination <input checked="" type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____		Other Civil <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property </div> <div style="width: 45%;"> <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____ </div> </div>		
Tax <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax		Probate & Mental Health <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <i>Probate/Wills/Intestate Administration</i> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings </div> <div style="width: 45%;"> <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____ </div> </div>		

3. Indicate procedure or remedy, if applicable (may select more than 1):

<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action	<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment	<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover
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CIVIL PROCESS REQUEST

FOR EACH PARTY SERVED YOU MUST FURNISH ONE (1) COPY OF THE PLEADING
FOR WRITS FURNISH TWO (2) COPIES OF THE PLEADING PER PARTY TO BE SERVED

CASE NUMBER: _____ CURRENT COURT: Dallas County District Court

TYPE OF INSTRUMENT TO BE SERVED (See Reverse For Types): Original Petition and Enclosures

FILE DATE OF MOTION: _____
Month/ Day/ Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

1. NAME: Dallas County Hospital District, dba Parkland Health & Hospital System

ADDRESS: 5201 Harry Hines Blvd, Dallas, TX 75235

AGENT, (if applicable): Dr. Thomas Royer

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): _____

SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP ☐ CONSTABLE
☒ CIVIL PROCESS SERVER - Authorized Person to Pick-up: Nicolas Valenzuela Phone: 214-951-5201
☐ MAIL ☐ CERTIFIED MAIL
☐ PUBLICATION:
Type of Publication: ☐ COURTHOUSE DOOR, or
☐ NEWSPAPER OF YOUR CHOICE: _____
☐ OTHER, explain _____

2. NAME: _____

ADDRESS: _____

AGENT, (if applicable): _____

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): _____

SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP ☐ CONSTABLE
☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____
☐ MAIL ☐ CERTIFIED MAIL
☐ PUBLICATION:
Type of Publication: ☐ COURTHOUSE DOOR, or
☐ NEWSPAPER OF YOUR CHOICE: _____
☐ OTHER, explain _____

ATTORNEY (OR ATTORNEY'S AGENT) REQUESTING SERVICE:

NAME: Nelson Akinrinade TEXAS BAR NO./TD NO. 24058715

MAILING ADDRESS: 10421 Sanden Drive, Dallas, TX 75238

PHONE NUMBER: 754 224-1779 FAX NUMBER: 972 4957831
area code phone number area code fax number

EMAIL ADDRESS: nelson@akinlaw.net

ENCLOSURE 1

REQUESTS FOR DISCLOSURE

Pursuant to Rule 194 of the Texas Rules of Civil Procedure, you are requested to disclose, within 50 days of service of this request, the information or material described in Rule 194.2 of the Texas Rules of Civil Procedure.

ENCLOSURE 2

PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSIONS TO PHHS

Pursuant to Rule 198 of the Texas Rules of Civil Procedure, it is requested that you serve the undersigned with written responses to the enclosed FACTS TO BE ADMITTED OR DENIED either by specifically admitting or denying the matters therein or detailing the reasons why you cannot truthfully admit or deny them. You must serve written responses to the Requests for Admissions within 50 days after service of these requests on within a time as provided in Texas Rules of Civil Procedure Rule 198.2(a).

FACTS TO BE ADMITTED OR DENIED

1. That Plaintiff Sandra Palmer was employed by PHHS as a social worker at all times material to this lawsuit.

ADMITTED: _____ DENIED: _____
2. That in 2011 PHHS had a policy that required social workers transcribe prescription vouchers for PHHS patients

ADMITTED: _____ DENIED: _____
3. That while employed by PHHS, part of Sandra Palmer's assigned responsibilities was to transcribe prescription vouchers for PHHS patients.

10. That in December 2011, PALMER complained to the Board of Social Work about PHHS' policy of asking social workers to transcribe patient's medication vouchers.

ADMITTED: _____

DENIED: _____

11. That between December 22, 2011 and January 12, 2012, Stella Coker asked PALMER for a copy of the response that PALMER received from the Board of Social Work.

ADMITTED: _____

DENIED: _____

12. That on or before February 6, 2012, John Wood became aware that Sandra Palmer had filed a complaint against him to the Texas Board of Nursing.

ADMITTED: _____

DENIED: _____

13. That on or before February 6, 2012, Stella Cooker became aware that Sandra Palmer had filed a complaint against her to the Texas Board of Nursing.

ADMITTED: _____

DENIED: _____

14. That on or before February 6, 2012, Natasha Henderson became aware that Sandra Palmer had filed a complaint against her to the Texas Board of Social Work.

ADMITTED: _____

DENIED: _____

15. That Sandra Palmer is the only social worker who questioned the authority of social workers to transcribe scripts for PHHS patients.

ADMITTED: _____

DENIED: _____

16. That PHHS no longer requires social workers to transcribe PHHS patient scripts.

ADMITTED: _____

DENIED: _____

17. That the Texas Social Work Board had never at any time authorized PHHS' social workers to transcribe patient scripts.

ADMITTED: _____

DENIED: _____

18. That it is a violation of the Texas Social Work Board policy for a social worker to transcribe patient scripts.

ADMITTED: _____

DENIED: _____

ENCLOSURE 3

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT PHHS

Pursuant to Rule 197 of the Texas Rules of Civil Procedure, you are required to: Answer separately and fully each of the INTERROGATORIES contained herein. Written responses and/or objections to these interrogatories must be delivered to the undersigned attorney 50 days after service of these interrogatories on you.

1. State your full name, address, occupation, title, and relationship to PHHS; also, please provide the full name, address, occupation, title, and relationship to the Defendant of each individual who assisted the answering of these interrogatories.

2. Please state specifically and in detail each job that the Plaintiff held including the dates during which the Plaintiff held each job, and provide a description of her job duties during such dates.

3. Please provide the name, title or other means of identification of each employee, agent or independent contractor of the Defendant who has custody of statistical information and personnel records indicating the rates of promotion, termination, pay increases and pay decreases for employees who occupied job duties and descriptions similar to those of the Plaintiff.

4. Please identify each writing or document that exists pertaining to the hiring, employment and termination of the Plaintiff, including but not limited to those writings contained within the Plaintiff's personnel files.

5. Please identify each supervisor or manager who was responsible for overseeing the work of the Plaintiff for the period between January 1, 2011 to February 6, 2012, and for each such person please provide the following information, specifically and in detail with respect to each:

A. His or her name, title and gender.

B. The name, address and telephone number of the person who has custody of all personnel files and records on each such supervisor or manager of the Plaintiff during the stated time.

6. Did Plaintiff ever raise to any officer, director, agent, or employee of the Defendant her concerns regarding transcribing prescriptions onto medication vouchers for PHHS patients? If your answer is anything other than an unqualified “No,” then for each and every instance of such a concern, please set forth the following information specifically and in detail:

A. The date and approximate time of the raising the concern.

B. The nature and substance of the concern.

C. The method of communication (i.e., in person, in writing, by way of telephone, email, etc.).

D. The name, title or other means of identification of the person to whom the concern was communicated.

E. The details of the action taken in response to the complaint, if any.

F. The name, title or other means of identification of each person (upper management or otherwise) to whom information regarding Plaintiff's concern was transmitted.

Also, provide the date that the communication on Plaintiff's concern was received by each such person.

G. State all actions that were taken by PHHS and its agents in response to each such concern raised by Plaintiff.

8. Between December 21, 2011 and February 6, 2012 did any PHHS employee receive any correspondence from the Texas Board of Social Work about PHHS's policy of asking social workers to transcribe prescriptions onto medication vouchers for PHHS patients? If your answer is anything other than an unqualified "No," then for each and every such correspondence, please set forth the following information specifically and in detail:

A. The name and title of each such employee and the date the notification was received.

B. The method of communication from the Texas Board of Social Work with each such PHHS employee (i.e., in person, in writing, by way of telephone, email, etc.).

C. The details of the action taken in response to the communication, if any.

9. Does the Defendant have any policies relating to retaliation in the workplace? If your answer is anything other than an unqualified "No," then for each and every policy, please set forth the following information specifically and in detail:

A. The nature and substance of the policy.

B. Whether the policy was ever reduced to writing, and if so, to whom was it distributed?

C. Each place where the policy was posted, and the date for each such posting (also set forth the date that the posting was removed if it is no longer posted in the subject location).

ANSWER

THE STATE OF TEXAS

COUNTY OF _____

BEFORE ME, the undersigned authority, on this day personally appeared

_____, known to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he/she executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this ____ day of _____, _____.

ENCLOSURE 4

PLAINTIFF'S FIRST SET OF REQUEST FOR PRODUCTION AND DISCOVERY TO PHHS

Pursuant to Rule 196 of the Texas Rules of Civil Procedure, Plaintiff requests that Defendant PHHS produce and permit the Plaintiff through designated counsel of record to inspect and copy, within 50 days after receipt of this Request by furnishing her with photocopies of these documents and things listed herein.

1. All diagrams, photographs, video recordings and notes taken of any and all discussions between the employees of PHHS and Palmer regarding the policy that social workers should transcribe medication vouchers for PHHS patients.
2. All diagrams, photographs, video recordings and notes taken of any and all discussions between or among JOHN WOOD, STELLA COKER, NATASHA HENDERSON, MIRIAM SILBEY and PALMER between December 6, 2011 and February 6, 2012.
3. All recordings and notes taken on or after 12/19/2011 by any PHHS employee of the investigation of the complaint of PALMER to Thomas Royer about PHHS social workers being asked to transcribe medication vouchers for PHHS patients.
4. All recordings, emails, notes, and investigatory notes taken by any PHHS employee regarding Palmer after Palmer had complained to Dr. Royer on January 20, 2012 about her supervisors' responses to her.
5. Any and all correspondence between Natasha Henderson and Palmer regarding the topic of social workers transcribing scripts for PHHS patients.

6. Any and all correspondence and notes written by John Wood regarding the topic of social workers transcribing medication vouchers for PHHS patients.
7. Any and all correspondence and notes written by Stella Coker regarding the topic of social workers transcribing medication vouchers for PHHS patients.
8. Any and all correspondence and notes taken by Miriam Silbey regarding the topic of social workers transcribing medication vouchers for PHHS patients.
9. Copies of any and all correspondence between the Texas Board of Social Work and PHHS regarding the topic of social workers transcribing medication vouchers for PHHS patients.
10. Copies of the PHHS policy in effect till December 31, 2011 regarding social workers transcribing medication vouchers for PHHS patients.
11. Copies of the PHHS policy in effect as of May 1, 2012 regarding social workers transcribing medication vouchers for PHHS patients.
12. The complete investigatory file (including any and all notes, interviews, reports, and all correspondence) that PHHS relied upon to terminate Palmer's employment. Please include the name and date of contribution by each person who contributed to the investigatory file.
13. The complete personnel file of Palmer as maintained by any employee or agent in whatever form it exists.
14. Copies of all correspondence between the Joint Commission and PHHS regarding any allegations filed against PHHS between January 15, 2012 and April 15, 2012.
15. The complete investigatory notes of any and all action and correspondence between Jim Johnson and anyone regarding the allegations of Palmer to Thomas Royer.

16. The complete investigatory notes of any and all action and correspondence between Kurt Delabar and anyone regarding the allegations that Palmer made to Thomas Royer regarding Palmer's supervisors.
17. The complete investigatory notes of any and all action and correspondence between Tena Bracy and anyone regarding the allegations that Palmer made to Thomas Royer about Palmer's supervisors.
18. A copy of Palmer's job description before her employment was terminated by PHHS.
19. Copies of PHHS Corrective Action policy documents that were relied upon in the termination of Palmer's employment.
20. Copies of PHHS' policy against retaliation.
21. Copies of PHHS' policy regarding whistleblowers.
22. Copies of PHHS's grievance policy.